

July 11, 1999
5220 North Capitol St. NW
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Washington, D.C. 20011-6739

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852
Re: Docket # 98N-1038

6748 '99 JUL 15 A11:33

Dear Folks:

I write to you now to express my dismay over the possibility that the FDA might allow the weakening of labelling requirements for irradiated food. Any foods, or any foods containing ingredients that have been treated by irradiation, ought to unequivocally be labelled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the *radura*, the international symbol for irradiated food. If the food is not packaged, then this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like other labels, irradiation labels are required by the FDA to be truthful, and therefore not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" must be retained. The use of the word "pasteurization" in the context of irradiated food would be clearly cynical, an attempt to soothe the public's fear by employing a word that has been long accepted when, in fact, irradiation has nothing to do with pasteurization. A decision by the FDA to use this term with irradiated food would only throw gasoline onto the fire of the public's mistrust of government. Who needs that?

I recognize the *radura* as information regarding a material fact of food processing. The requirement for irradiation disclosure (both label and *radura*) should not expire at any time in the future, period. The material fact of processing remains. Even if some consumers become familiar with the *radura*, new consumers (e.g. young people or immigrants) will not be. The symbol should be clearly understandable at the point of purchase for everyone. If there is no label, consumers will surely be misled into believing that the food has not been irradiated.

Lastly, because of the "magic" (as well as ease and low cost) of posting information on the Internet, I request that the FDA place all comments from the public on this topic on the FDA's website, so that the website will be easily accessible to the public. I believe it's imperatively democratic that we, the citizens, know who is commenting here.

Yours,

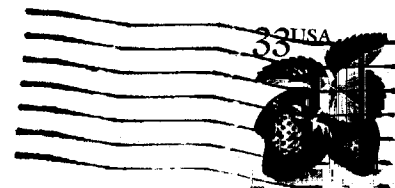
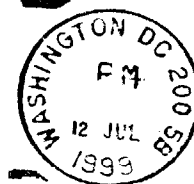

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